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As the HR/Safety Director of a commercial construction company, I urge you to consider the following.

- It is highly portable. We have job sites scattered all over the state. If I had to pull people off the job site for a urine test, it detracts from the work force and slows production.
- It is non-invasive to most people. I have had no complaints or jokes about intimacy of this process.
- It is more sanitary. I have no problem carrying a relatively flat plastic envelope to a drop off point where carrying a urine cup with lid can be more likely to "open".
- There are no "privacy" issues. As a female director with mostly male employees, an oral test is much, much easier to administer and I can stand there and watch every move.
- The swab is neat. Instead of the proposed "spitting" the use of the swab is much less disgusting. I have a hard time keeping these guys from spitting, much less telling them to.
- Duplicating tests - currently I must duplicate testing with my DOT drivers as their random selection must be substantiated with a urine test. As I only have a few drivers the cost is not very damaging, however, if this is required across the company it could become unduely burdening.
- Adulteration. I do not see anyway an oral test could be adulterated if watched. I know a man who used to tape a plastic bag of his wife's urine to his leg every morning so his company wouldn't catch him in a random urine test. His company tested him repeatedly and could not "catch" him as a positive test. It was the right color, temperature, etc.

Thank you for considering these points.